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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO/OAKLAND DIVISION**

META PLATFORMS, INC., a Delaware
 corporation,

*Plaintiff/Counterclaim
 Defendant,*

v.

BRANDTOTAL, LTD., an Israeli
 corporation, and
 UNIMANIA, INC., a Delaware
 corporation,

*Defendants/Counterclaim
 Plaintiffs.*

Case No.: 3:20-CV-07182-JCS

DEFENDANTS' STATUS REPORT

Judge: The Hon. Joseph C. Spero
 Ctrm.: Courtroom F – 15th Floor

1 Defendants BrandTotal, Ltd. and Unimania, Inc. (collectively “BrandTotal”) respectfully
2 submit this Status Report concerning BrandTotal’s “second review” of documents that were
3 captured by BrandTotal’s privilege screen employed as part of BrandTotal’s production of
4 documents pursuant to the parties’ joint stipulation. *See* ECF Nos. 216, 221.

5 BrandTotal has completed its collection of Gmail, Google Drive, and Slack messaging
6 documents from the 11 custodians identified in the Joint Stipulation. BrandTotal has collected
7 1,120 GB of data from Gmail and Google Drive alone and will make a large production by January
8 18, 2022, and will produce all remaining documents that do not hit on the privilege screen on
9 January 20, 2022, as directed by the Court.

10 BrandTotal has completed search term and privilege screens for two custodians and has
11 identified approximately 17,000 documents from those custodians that hit on the privilege screen.
12 Although BrandTotal, through its discovery vendor, is still working to apply a privilege screen to
13 the collected documents for the remaining custodians that “hit” on the stipulated search terms,
14 BrandTotal proposes a deadline of a final privilege of January 28, 2022.

15 This proposed deadline is based on the percentage of documents that are caught by the
16 privilege screen for those custodians where the stipulated search terms have been run and the
17 estimated time needed to review such documents if privilege screens for the remaining custodians
18 return an approximately equal number of captured documents.

Date: January 14, 2022

Respectfully submitted,

By: /s/ Dustin L. Taylor

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of January, 2022, I caused the foregoing to be filed electronically with the Clerk of Court and to be served via the Court's Electronic Filing System upon all counsel of record:

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